

State Water Resources Control Board

February 1, 2017

(Via email and Certified Mail)

CERTIFIED MAIL
NO. 7015 1520 0001 8017 1696

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
kaluc@metro.net

**SUBJECT: NO ENFORCEMENT FOR LINE LEAK DETECTORS ON UNDERGROUND
STORAGE TANK SYSTEMS LOCATED AT METRO DIVISION 15,
11900 BRANFORD STREET, SUN VALLEY**

Dear Mr. Kalu:

The State Water Resources Control Board (State Water Board) is in receipt of the documents that the Los Angeles County Metropolitan Transportation Authority (Metro) submitted in response to the State Water Board's February 16, 2016 Notice of Violation (NOV). The documents demonstrate that the ongoing violations have been corrected except for violation 7, Failure to Install Line Leak Detectors (LLD).

In its April 8, 2016 response, Metro explains that the pneumatic pumps used for the motor oil, torque oil, and antifreeze tank systems experience high pressure changes that exceed the operating capabilities of any LLD currently available. Additionally, Metro explains that the following measures are used to ensure the tank systems are safely operated: programmed with positive shut down and fail safe; audible and visual monitoring alarms; facility is manned 24-hours a day, seven days a week; conducts visual and daily remote monitoring; and performs a 0.1 gallon per hour precision line test on the antifreeze pressurized lines. The State Water Board understands that there is currently no precision line test that exists for use with the torque and motor oil tank systems.

While the State Water Board sympathizes with Metro's situation, California Code of Regulations (CCR), title 23, chapter 16, section 2636(f)(2), requires underground pressurized piping to be equipped with a LLD. There is no exception to this requirement, even for those underground storage tank (UST) systems where there is no current practical means of compliance.


Because there is no available technology that would allow Metro to become compliant with the LLD requirement for the aforementioned USTs, the State Water Board intends to use its discretion and not initiate enforcement regarding this violation. In addition to the measures Metro has taken, the State Water Board will require Metro to annually test the ASCO solenoid valves, ensure the devices are tagged at the time of testing, and include them on the annual monitoring certification documentation. This additional monitoring requirement must be noted in

the corresponding monitoring plans and approved by the local agency, Los Angeles City Fire Department.

This determination does not preclude the State Water Board or any other local, state, or federal agency from exercising any enforcement authority it may have and extends only for as long as Metro maintains compliance with the other UST requirements found in chapter 6.7 of the Health and Safety Code and chapter 16 of title 23, California Code of Regulations.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

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